

DRAFT 5/28/03
for Working Group Discussion

Mr. Charles H. Bronson, Commissioner
Florida Department of Agricultural and Consumer Services
The Capital
Tallahassee, Florida 32399-0800

Dear Commissioner Bronson:

The South Florida Ecosystem Restoration Task Force and its Florida-based Working Group coordinate the protection and restoration of the Everglades and South Florida ecosystems. The Task Force and Working Group have worked together with stakeholders to implement important programs such as the Comprehensive Everglades Restoration Plan, the Modified Water Deliveries to Everglades National Park program, the Multi-Species Recovery Plan, and control of exotic invasive species.

The Working Group has recently learned through its Science Coordination Team of a proposal by Biomass Investment Group, Inc., to plant 8,000 acres of an exotic plant, giant reed (*Arundo donax*), west of Lake Okeechobee, to provide fuel for a proposed power plant in Glades County. The distribution of the giant reed in Florida is currently limited and is not extensively distributed to warrant consideration as an invasive species; however, the Florida Exotic Pest Plant Council has examined the documented invasive nature of this species in California and other states, and is very concerned about its potential threat in Florida, particularly in wetlands. The Task Force and Working Group have focused national and state attention on the need to put in place strategic plans and programs to identify, control and eradicate exotic invasive plant species that threaten the ecological functioning of Florida's natural areas. The potential for establishment of giant reed in Florida as yet another in a long list of exotic invasive plants is of serious concern to the state, regional, local and federal agencies and tribes represented on the Task Force and the Working Group.

Common reed (*Phragmites australis*), a native to Florida, has been recommended by plant biologists as an alternative plant source. This species has been demonstrated to surpass *Arundo donax* in biofuel production and would eliminate the concern of spreading another exotic plant in South Florida wetlands.

A few quick facts about giant reed include:

- Giant reed poses a significant threat to native areas in California and it has escaped in several states in the southeastern United States. In Virginia, it is considered an "invasive alien plant species."
- It has proven its ability to escape ornamental cultivation in 30% of Florida's counties, and is beginning to become established in portions of northern Florida. At Washington Oaks State Park, in Flagler County, it has become very difficult to control.

- Once established, giant reed can be extremely expensive to control. In California, control is expected to cost millions of dollars.
- It generally spreads by rhizomes and fallen stem fragments, forming dense stands.
- A native plant that also grows rapidly and could be substituted for the giant reed as a potential fuel source is the common reed (*Phragmites australis*). This would be a perfect “green technology” plant to use for the Glades County generation plant.

Given the costly and negative experience with giant reed in other states and the evidence of escape in North Florida, the Task Force and Working Group agree that giant reed is very likely to become a significant exotic pest plant in south Florida, where wetland systems form a significant portion of the landscape. Prevention is the most efficient and cost-effective approach to control this exotic plant. The South Florida Ecosystem Restoration Task Force and the Working Group therefore urge you to consider listing the giant reed as a Florida terrestrial noxious weed under Chapter 5B-57.007(2), Florida Administrative Code. Time is apparently of the essence given the proposals to go forward with planting giant reed on a large scale in South Florida, thus, expeditious listing would significantly help prevent the serious threat to the Everglades posed by this invasive plant.

Sincerely,